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11

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14
15 BALLY GAMING, INC., a Nevada corporation
d/b/a BALLY TECHNOLOGIES,

16 Plaintiff and Counterdefendant,
17 vs.
18 IGT, a Nevada corporation,
19 Defendant and Counterclaimant.
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21 IGT, a Nevada corporation,
22 Third Party Plaintiff,
23 vs.
24 SIERRA DESIGN GROUP, a Nevada
corporation,
25 Third Party Defendant.
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Case No. 3:06-CV-0483-ECR (RAM)

**REQUEST TO FILE DOCUMENTS UNDER
SEAL AND ORDER**

REQUEST TO FILE UNDER SEAL

Plaintiff Bally Gaming Inc. (“Bally”) respectfully requests the Court allow Bally to file under seal the following documents:

- Plaintiff Bally Gaming, Inc.’s Opposition to IGT’s Motion for Temporary Stay of Discovery; and
 - The Declaration of Amy H. Candido in Support of Plaintiff Bally Gaming, Inc.’s Opposition to IGT’s Motion for Temporary Stay of Discovery.

The Stipulated Protective Order Regarding Confidential and Privileged Information provides that, “To the extent that any Confidential or Highly Confidential Information is contained in, incorporated in, reflected in, described in, or attached to any document submitted to the Court, counsel shall file that submission under seal.” (See Docket Entry No. 54 at ¶ 12.) The Order defines “Confidential” material as any information that the designating party has a good faith belief to be non-public. “Highly Confidential” material is any information that the designating party has a good faith belief to be proprietary information, trade secrets, or other highly sensitive commercial or competitive information. (See id. at ¶¶ 3-4.)

For the foregoing reasons, Bally respectfully requests the Court to order that the aforementioned documents, along with all exhibits, shall be maintained under seal.

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2 Dated: January 28, 2008
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4 /s/
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15 Third Party Defendant Sierra Design
Group.

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17 IT IS SO ORDERED
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19 Dated: January 29, 2008.
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22 Hon. Robert A. McQuaid, Jr.
United States Magistrate Judge
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